

EXHIBIT 6

CAUSE NO. 24-07-11639

DUSTIN ETTER	§	457 th JUDICIAL DISTRICT COURT
v.	§	
JEROD P. FURR, et al.	§	MONTGOMERY COUNTY, TEXAS

**JEROD P. FURR'S, CORINA FURR'S, ALLIANCE FARM & RANCH, LLC'S,
AE PARTNERS HOLDINGS, INC.'s, ALLIANCE ENERGY PARTNERS,
LLC'S, AEP ASSET HOLDINGS, LLC'S, and INVICTIS DRILLING
MOTORS, LLC'S OBJECTIONS AND ANSWERS TO PLAINTIFF'S SECOND
SET OF INTERROGATORIES**

TO: Dustin Etter, by and through his attorney of record, Noah Meek, IRELAN
MCDANIEL, PLLC, 2520 Caroline Street, 2nd Floor, Houston, Texas 77004.

Pursuant to Rule 197.2 of the Texas Rules of Civil Procedure, Defendants, Jerod
P. Furr, Corina Furr, Alliance Farm & Ranch, LLC, AE Partners Holdings, Inc.,
Alliance Energy Partners, LLC, AEP Asset Holdings, LLC, and Invictis Drilling
Motors, LLC serve their Objections and Answers to Plaintiff's Second Set of
Interrogatories.

Respectfully submitted,

/s/ Alyssa M. Cuellar

J. Randal Bays

State Bar No. 01943900

randy@baysfirm.com

Alyssa M. Cuellar

State Bar No. 24135656

alyssa@baysfirm.com

THE BAYS FIRM

1503 Hailey Street

Conroe, Texas 77301

Tel: (936) 760-7670

Fax: (936) 760-7671

ATTORNEYS FOR JEROD P. FURR,
CORINA FURR, ALLIANCE FARM &
RANCH, LLC, AE PARTNERS
HOLDINGS, INC., ALLIANCE

ENERGY PARTNERS, LLC, AEP
ASSET HOLDINGS, LLC'S, and
INVICTIS DRILLING MOTORS, LLC

PLAINTIFF'S SECOND SET OF INTERROGATORIES

INTERROGATORY NO. 9: Please identify and briefly describe any debt owed by Alliance Farm & Ranch, LLC or any other entity wholly owned by Jerod P. Furr to AE Partners Holdings, Inc. or any subsidiary or affiliate of AE Partners Holdings, Inc. at any time on or after 1/1/2022. Please include in the description of each such debt:

- (a) The original principal amount of the debt;
- (b) The current amount owed on the debt;
- (c) The date the debt was incurred;
- (d) The interest rate for the debt;
- (e) The maturity date of the debt;
- (f) What promissory note or other written instrument, if any, memorializes the debt;
- (g) Whether the debt has been modified or forgiven; and
- (h) The general purpose of the debt (i.e. to buy real property).

ANSWER: None.

INTERROGATORY NO. 10: Please identify and briefly describe any lease agreement between Alliance Farm & Ranch, LLC and AE Partners Holdings, Inc. or any subsidiary or affiliate of AE Partners Holdings, Inc.

ANSWER: See attached Lease Agreement labeled AEPARTNERS307-AEPARTNERS317.

CERTIFICATE OF SERVICE

This is to certify that on January 2, 2025, Jerod P. Furr's, Corina Furr's, Alliance Farm & Ranch, LLC's, AE Partners Holdings, Inc.'s, Alliance Energy Partners, LLC's, AEP Asset Holdings, LLC's, and Invictis Drilling Motors, LLC's Objections and Answers to Plaintiff's Second Set of Interrogatories was served on the following counsel of record via e-service pursuant to Rules 21 and 21a of the Texas Rules of Civil Procedure:

Noah Meek
IRELAN MCDANIEL, PLLC
2520 Caroline Street, 2nd Floor
Houston, Texas 77004.

/s/ Alyssa M. Cuellar
Alyssa M. Cuellar